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**VIA ECF AND E-MAIL**

**MEMO ENDORSED**  
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Hon. Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007  
ReardenNYSDChambers@nysd.uscourts.gov

**Re: *Freeman v. Commonwealth Local Development Corp., et al.*,  
Civil Action No.: 1:24-cv-08823**

Dear Judge Rearden:

This firm represents Defendants Rainbow USA Inc. ("Rainbow") and A.I.J.J. Enterprises, Inc. ("A.I.J.J.") in the above-referenced matter. For the reasons set forth below we write, jointly with Plaintiff Shaniqua Freeman ("Plaintiff"), to respectfully request that the Court extend the deadlines in the Court's Order to Show Cause dated January 11, 2025 (ECF No. 17) by three (3) weeks and that A.I.J.J. and unrepresented defendants Commonwealth Local Development Corp. ("Commonwealth Local") and HUSA Management Co., LLC ("HUSA Management") be permitted to file their respective Answers by February 3, 2025.

By way of background, Plaintiff filed her Complaint on or about November 20, 2024. (ECF No. 1.) On January 16, 2025, the Court granted Rainbow's request for an extension of its responsive pleading deadline from the original deadline of January 2, 2025 through and including February 3, 2025 (ECF No. 16.) Since that time, the undersigned determined that this firm would represent A.I.J.J. as well, and accordingly filed a Notice of Appearance for this entity today. The undersigned will be filing an Answer on behalf of both Rainbow and A.I.J.J. as soon as practicable and no later than February 3, 2025.

Rainbow and A.I.J.J. are in the process of communicating with Commonwealth Local and HUSA Management with respect to the Complaint in this action, the Court's Order to Show Cause (ECF No. 17), and the respective responsibilities and obligations of Defendants under the applicable lease documents. So the Defendants can conclude those discussions, we respectfully request that: (1) Plaintiff be relieved from the requirement that she serve ECF No. 17 on the Defendants; (2) the unrepresented Defendants be provided until February 3, 2025 to enter appearance(s) of counsel and



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respond to the Complaint; and (2) Plaintiff have until February 12, 2025 to either respond to the Order to Show Cause or serve her motion for default judgment and supporting papers on any non-answering Defendants, and file a corresponding affidavit of service on ECF by February 14, 2025.

This application is being filed in good faith, and not to cause undue delay but rather potentially avoid delays, fees and expenses and resource expenditures associated with default proceedings.

This is the first application for an extension of the Order to Show Cause deadlines that, if granted, would not affect any scheduled dates. The undersigned has communicated with counsel for Plaintiff, and Plaintiff joins in this application.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan  
John W. Egan

Enclosure

cc: All counsel of record (via ECF)

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Application granted in part. Plaintiff Shaniqua Freeman's deadline to seek a default judgment against Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC, or to show cause why this action should not be dismissed against those Defendants for failure to prosecute, is extended to **February 12, 2025**. Plaintiff's deadline to file a corresponding affidavit of service on ECF is extended to **February 14, 2025**. Defendants Commonwealth Local Development Corp., HUSA Management Co., LLC, and A.I.J.J. Enterprises, Inc.'s deadline to respond to the Complaint is extended *nunc pro tunc* to **February 3, 2025**. Plaintiff is not relieved of the requirement that she serve ECF No. 17 by overnight courier on unrepresented Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC. Plaintiff is relieved of the requirements under ECF No. 17 with respect to A.I.J.J. Enterprises Inc.

The Clerk of Court is directed to terminate ECF No. 19.

SO ORDERED.

A handwritten signature in blue ink that reads 'Jennifer H. Rearden'.

Jennifer H. Rearden, U.S.D.J.

Dated: January 21, 2025